

# 2013 Pinehurst Exceptional Events Comment Package

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## Public Comment Period for 2013 Pinehurst Wildfire and High Wind Dust Exceptional Events



State of Idaho  
Department of Environmental Quality

September 27, 2016

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## **Appendix A Public Comments Received for 2013 Pinehurst Wildfire and High Wind Exceptional Events**

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Subject: "Exceptional Events Demonstration Requesting Exclusion of PM 2.5 Monitor Values Impacted by Wildfires at Pinehurst, Idaho, in 2013" - Public Comments

August 28, 2016

Ms Drier,

Thank you for the opportunity to comment on IDEQ's request for concurrence on exceptional events (EEs) that affected the air quality in the Pinehurst area in 2013 regarding PM 2.5. This IDEQ document reflects a great deal of research and documentation. I also appreciate that IDEQ is also requesting concurrence for the September 15-16 High Wind Dust (haboob) exceptional event days in its "Exceptional Events Demonstration Requesting Exclusion of PM2.5 and PM10 Monitor Values at Pinehurst, Idaho, Impacted by September 15–16, 2013, High Wind Dust Event" document. My comments are categorized as General Comments, Specific Comments and Related Comments, all of which are for IDEQ and public consumption.

**General Comments:**

There is a housekeeping omission of "Appendix C" in the Report Summary on page ix; instead the reader sees "0" with a hyperlink to the appendix.

Per IDEQ, "The Exceptional Events Rule (EER) requires that demonstrations to justify data exclusion as exceptional events shall provide evidence that the event (a) affects air quality; (b) is not reasonably controllable or preventable; (c) is a natural event or is an event caused by human activity that is unlikely to recur at a particular location; (d) that there is a clear causal relationship between the identified source and measurement under consideration; (e) that the event is associated with measured concentrations in excess of normal historical fluctuations, including background; and (f) that there would have been no exceedance or violation of the standard but for the event. In addition, the state must document that prompt public notification procedures and measures to reduce public exposure were followed and that the public comment process was followed in reviewing the demonstration. All of these criteria must be met for each EE day submitted for EPA concurrence."

The 2012 Revised PM 2.5 NAAQS caused the towns of Pinehurst, Pine Creek, Page, Smelterville, Kellogg, Wardner, Kingston and the eastern Shoshone County portion of Cataldo to be designated as nonattainment. The area was misnamed the West Silver Valley Nonattainment Area (WSV NAA). The Silver Valley is a nickname and the Silver Valley actually ends westerly at the base of the 4<sup>th</sup> of July Pass, well into Kootenai County. The actual 2011-2013 Design Value (DV) for the WSV NAA is a mystery to the public because IDEQ had failed to meet the EPA-imposed deadlines to request their concurrence on all flagged exceptional event (EE) days in 2011, 2012 and 2013. I understand that the Design Value (DV) was initially 12.8 µg/m<sup>3</sup>, but since then I have seen 12.28 µg/m<sup>3</sup>. Upon concurrence with the 2013 EEs, the 14.7 µg/m<sup>3</sup> 2013 annual mean will drop. What will the final DV be and will this new number be posted for all to see? [IDEQ has, until recently at my insistence, not only failed to publicly declare that the Pinehurst/Pine Creek areas received an EPA Clean Data Determination (CDD) for its PM 10 nonattainment in 2001, but has also failed to begin the process to redesignate the areas to attainment, some 15 years later. The agency did however, complete this process for all other PM 10 nonattainment areas in the state within 3 years of their CDDs.]

In order to bring the WSV NAA's 2011-2013, 2012-2014 & 2013-2015 DVs to where they would be if the EEs are included, and to hasten the return to attainment, IDEQ is obligated to analyze and submit every flagged EE day. Through public record requests, I have read emails concerning IDEQ's struggle to find the necessary data for these days, when they occurred two years prior to work-up and three years prior to their submission. Days that IDEQ cannot locate all of the required data are left in the annual mean to provide a false high  $\mu\text{g}/\text{m}^3$ .

Prescribed Burns are another source of smoke that may be flagged as exceptional events by the EPA; however, they cannot be submitted unless IDEQ has an accepted Prescribed Burn Smoke Management Plan on file with them. This plan, IDAPA 58.01.01.614.02(a) & (b) was codified on May 1, 1994. "(a) Whenever a permit or plan is not required by the Department of Lands, U.S.D.A. Forest Service, or any other state or federal agency responsible for land management, any person who conducts or allows prescribed burning shall meet all conditions set forth in a Smoke Management Plan for Prescribed Burning. (5-1-94). (b). The Department will develop and put into effect a Smoke Management Plan for Prescribed Burning consistent with the purpose of Sections 600 through 616. IDEQ has yet begun to create this 22 year old mandate. This future project and submission is eagerly awaited, since this type of smoke is cited as the highest emission source for Shoshone County and the second highest for the WSV NAA.

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**Specific Comments:**

July EEs. Although IDEQ is submitting July 1 (26.8) & July 2 (22.6), it is omitting July 3 (14.3) & July 4 (15.3). IDEQ is obligated to submit these two days since: 1) they were higher than most of the proposed dates; and 2) it proposes to submit July 25 (12.0), which does not qualify as an EE. Justification can be found in two locations. The North Idaho Air Quality Summary for [July 2013](#) states, "During the *month of July* smoke from wildfires in the western U.S. were brought into the area by the prevailing winds and caused particulate levels to increase especially during the end of the month. Large fires were reported in Washington, Oregon, northern California, Idaho, Montana and Wyoming." In its [April 2014 Addendum](#) for Salmon's extra EE days, IDEQ states in part, "The 2012 wildfire season can be treated as a single event occurring of many consecutive days. Therefore, DEQ has reviewed all the days during the 2012 wildfire season for Salmon and is including all days that meet the requirements for exceptional events."

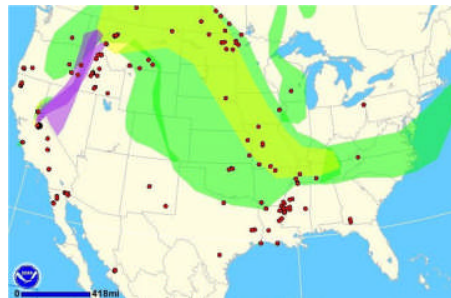
Online data available for July 3, 2013: <http://wildfiretoday.com/2013/07/02/smoke-map-july-3-2013/> shows the entire western 2/3 of the nation was covered with wildfire smoke:



For the next day, July 4, 2013, I can only locate data of fires still continuing on and it would seem that given the extent of smoke from July 1 through July 3, the 15.3  $\mu\text{g}/\text{m}^3$  would have no other cause. Refer again to the above data for justification.

August EEs. Although IDEQ is submitting August 24 (16.4) and August 25 (12.9), it is omitting August 23 (13.0), which obviously began the exceedance streak and is higher than one of the two days being submitted. The same two justifications apply to these dates as the July dates. The [August 2013](#) North Idaho Air Quality Summary states, "During the *month of August* smoke from wildfires in the western U.S. were brought into the area by the prevailing winds and caused particulate levels to increase. Large fires were reported in Washington, Oregon, northern California, Idaho, Montana and Wyoming."

The same website as above <http://wildfiretoday.com/2013/08/23/smoke-map-2/> shows this smoke map for August 23, 2013, clearly depicting the WSV NAA was immersed in wildfire smoke:



*Wildfire smoke, at 5:10 p.m. MDT, August 23, 2013. The purple color represents dense smoke.*

September EEs. Although IDEQ is submitting 9/14 (14.4), it is omitting 9/11 (12.2), 9/12 (15.4), 9/13 (13.2). September 10 (11.8) obviously was leading into the exceedance streak. These days should be included for the same reasons as in July, above.

ALL of these days (July 3, 4, August 23, September 11, 12, 13) must be submitted in order to bring the Pinehurst area to its completely accurate 2013 annual mean, as well as the 2011-2013, 2012-2014 and 2013-2015 DVs, especially since the area is in PM 2.5 nonattainment. If IDEQ cannot add these dates for submission, it should explain to the reader why it cannot.

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#### **Related Comments:**

In a recent meeting between IDEQ Director John Tippets, CRO Administrator Dan Redline, the Shoshone County Commissioners and myself, Mr. Tippets was shocked to learn that the 2015 wildfire season brought 47 flagged EEs to the WSV NAA and that these days will not be submitted to the EPA until 2018. He asked why IDEQ does not gather all of the necessary data immediately, rather than waiting so long and losing some of it. The answer from Mr. Redline was essentially that some information is stored immediately, but IDEQ's personnel are stretched too thinly to be able to fully accomplish this and their other tasks when the submission deadline is 3 years away. This resource problem is not a valid reason to allow any statutorily-flagged EE days to be left in the annual mean, especially in a nonattainment area.

There are allegations that Climate Change will bring about more catastrophic wildfires in the western states. The USFS's current policy is to let most (lightning-caused) wildfires burn without aggressive suppression, which allows them to serve as de facto prescribed burns. The EPA is continually strengthening the NAAQS, and is likely to reduce in the 24-hr PM 2.5 NAAQS down to at between 30- 33  $\mu\text{g}/\text{m}^3$  in 2020 or 2021 (my speculation). This reduction will likely result in nonattainment designations in about half of Idaho's core monitoring stations. Clearly, a policy change is needed at IDEQ, as well as EPA and the USFS. The EPA is currently developing its final revision of the EER.

It is felt that the IDEQ has brought much of this EE Concurrence work product upon themselves. If an area meets the NAAQS with the EEs included, no submission of EEs is required, or accepted, by the EPA. If it is over the NAAQS, only the days necessary to bring it to the standard is required, or accepted. These areas allow IDEQ staff to spend less time on EEs and more time on other tasks, such as the redesignation to attainment process needed for Pinehurst's PM 10 debacle or the two Smoke Management Plans that are 22 years late etc.

I strongly believe that the WSV PM 2.5 nonattainment designation is inappropriate and unjust, and that IDEQ should take immediate action to request its revocation due to its own actions, rather than actual PM 2.5 violations.

Through documents published on the Federal Register beginning around 2007, IDEQ and the public, had been aware that the strengthened PM 2.5 standard was going to be within the 11-13  $\mu\text{g}/\text{m}^3$  range, making it no surprise that 12.0  $\mu\text{g}/\text{m}^3$  was selected. The Pinehurst area has historically hovered around this annual mean.

Monitor accuracy is very important in attainment designation decisions; 12.1  $\mu\text{g}/\text{m}^3$  is considered nonattainment. It is unclear how such an exact number can be measured, and unfortunately the EPA does not mandate the NAAQS reporting monitors to measure this accurately. The EPA does however, consider the Federal Reference Method monitor (FRM) to be the "gold standard" for accuracy. The EPA conducted a study in 2010 comparing all operational TEOM FDMS (FDMS) and BAM 1020 (BAM) monitors in the U.S to their station's collocated FRM "gold standard" monitors from 2009-2010. There were 17 FDMS monitors, including IDEQ's [Pinehurst FDMS](#), and 61 BAM monitors, including IDEQ's [Pinehurst BAM](#). I was able to get EPA to activate the broken links to access the data sets on this page: <https://www.epa.gov/air-quality-analysis/particulate-matter-naaqs-review-analyses-and-data-sets>.

Both monitors failed to meet the comparability statutes. The FDMS monitor failed in: "All Data" (1.13), 2010 (1.15) and in the 2009-2010 seasons of Spring (1.18), Autumn (1.12) and Winter (1.15). The FRM monitor read 11.7  $\mu\text{g}/\text{m}^3$  for 2009-2010, while the FDMS read 13.2  $\mu\text{g}/\text{m}^3$ ; a difference of 1.5  $\mu\text{g}/\text{m}^3$ , which is very important since 0.1 can make a difference. The BAM monitor failed in: "All Data" (1.13), 2010 (1.15), and in the 2009-2010 seasons of Spring (1.18), Autumn (1.12) and Winter (1.15). The FRM monitor read 11.7  $\mu\text{g}/\text{m}^3$  for 2009-2010, while the FDMS read 13.2  $\mu\text{g}/\text{m}^3$ ; a difference of 1.5  $\mu\text{g}/\text{m}^3$ . I have not analyzed the BAM data from all 61 sites yet, but I have analyzed the data from the 17 FDMS sites. The [Pinehurst/Pine Creek](#) area was the 2<sup>nd</sup> worst performing monitor in the nation, being surpassed only by Ft. Wayne, IN.

Based on the results of this nationwide study, the EPA immediately advised the States to use the FRM monitor as the primary if an area was in danger of being designated as nonattainment. There is no conceivable way that IDEQ did not know any of this before or after the [results](#) were sent to the docket EPA-HQ-OAR-2007-0492, and IDEQ certainly knew the Pinehurst area was "in danger of nonattainment", no matter what EPA lowered the standard to. (IDEQ staff has said for over a year now, that Pinehurst will not make the upcoming 24-hr standard, when it is not officially due to publish until 2020. The designated assessment time frame will likely be 2018-2020. The designated assessment time frame for the 2012 Rule was 2011-2013.) Yet on January 1, 2011, the agency arbitrarily switched the primary NAAQS reporting monitor in Pinehurst from the FRM to the FDMS, and notified the EPA about it [afterward](#), on July 1<sup>st</sup>, via the [2011 ANP](#). EPA is to assess and approve primary monitor changes [in advance](#) of any changes in primary monitors.

Beyond the above study, IDEQ knew that this change in primary monitors should not have occurred. In its 2009 Annual Ambient Air Quality Monitoring Network Plan ([ANP](#)), IDEQ cited the FDMS with a 2006-2008 DV that was 7

µg/m<sup>3</sup> higher than the FRM (the FDMS was responsible for the 2007-2008 data, and was used for AQI purposes only) and stated that the BAM 1020 would be replacing it, as an AQI monitor. Pages 5 & 21. Instead, the FDMS was not only left on site without any reason or further mention, but was later redesignated as the primary NAAQS monitor, supposedly based on its adequate comparability in 2010. We have seen the comparability in the EPA study: 1.15-failure. It must have seen some maintenance work done on it because it performed satisfactorily for 2011 & a couple of months in 2012. It showed a sharp decline in performance and was out of service for 114 days from March 22-July 13 in 2012. On March 8, 2012 the FDMS value was 14.2 µg/m<sup>3</sup> higher than the collocated FRM. Its return in July failed to see any improvement; only a continued decline in comparability until the end of 2013. For example, October 30, 2013 shows the FDMS value was 6.1 µg/m<sup>3</sup> higher than the FRM. October, November & December saw FDMS values an average of 2.9, 2.5 & 2.4 µg/m<sup>3</sup> higher than the FRM, respectively. CFR failures.

The 2014 [ANP](#) states, "The Pinehurst BAM has shown a strong correlation against the FRM via the Class III FEM/FRM comparative criteria and is anticipated to become the primary monitor and replace the TEOM FDMS. The TEOM FDMS has had numerous issues that have compromised data completeness, and it has also not correlated as well against the FRM." A letter in the Appendices states, "With time, repairs and instrument downtime for the unit has increased. Not only does this add to our operating costs during a time when budgets are tight, it leads to gaps in critical data considering the impending designation of nonattainment (annual PM<sub>2.5</sub> NAAQS) for the airshed. Statistical comparison of the BAM/FRM relationship met the Class III FEM acceptance criteria and DEQ would like now to designate the BAM 1020 FEM as the primary PM<sub>2.5</sub> monitor at the Pinehurst monitoring site."

On January 1, 2014 IDEQ made another fatal error and began using the BAM 1020 as the primary monitor, and only in Pinehurst. The agency was assessing the comparability of the BAM for two years at all other core sites. IDEQ completely ignored the above EPA study, its own Pinehurst BAM data, and EPA's guidance to use the FRM as the primary monitor in areas close to nonattainment. A [2006 CARB](#) study on the BAM 1020 stated, "When annual averages are compared, the BAM-1020 averages 3 mg/m<sup>3</sup> greater than the FRM. While a difference of 3 mg/m<sup>3</sup> is insignificant when evaluating peak hourly (or daily) PM<sub>2.5</sub> levels, it becomes much more significant at levels near the annual state standard of 12 mg/m<sup>3</sup>." It failed comparability miserably, as expected, and on January 1, 2015, IDEQ returned to the FRM as the primary monitor. From 2011-2014, the monitors were the reason for nonattainment.

Removing all 2015 flagged EEs, not surprisingly, the WSV NAA reported an annual mean below 11.0 µg/m<sup>3</sup> for the year. All 2015 EEs should be submitted to help achieve a quicker return to attainment.

In a scenario where IDEQ had continued use of the daily observations from the FRM as the primary monitor in the 2011-2013, 2012-2014 & 2013-2015 DV's, there would be need for very few EE submissions, and there would very likely be no WSV NAA. Since the FRM was removed from daily observations, this scenario cannot be certain; however, averaging the data that is available for these years, the area would not have gone into nonattainment.

In summary, IDEQ must submit all flagged EE days above 12.0 µg/m<sup>3</sup> in 2013. IDEQ staff made a fatal error in switching from the FRM to the FDMS from 2011-2013 and again later by switching to the BAM in 2014. The area would not be in nonattainment and IDEQ staff could then have used its resources, and the citizens' tax dollars, on other issues instead. IDEQ cannot keep saying, "We can't go back and fix it now."; it must fixed, now. This area should not have to take the socio-economic hits that come with having the "5<sup>th</sup> worst polluted air in the nation", per the EPA grant application. This is simply not true. IDEQ must implement IDAPA 58.01.01.614.02(a) & (b) as soon as possible, since it was codified over 22 years ago.



Thank you again for the opportunity to comment on the 2013 Exceptional Events in the Pinehurst area.

Respectfully submitted,

(b) (6) Pinehurst resident

cc      File  
         IDEQ Director John Tippets  
         Shoshone County Board of County Commissioners  
         Sen. Sheryl Nuxoll  
         Rep. Shannon McMillan  
         Rep. Paul Shepherd



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8/26/2016

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**RE: Request to Exclude 2013 PM<sub>2.5</sub> Monitoring Values Impacted by Wildfires at Pinehurst, ID**

Dear Ms. Drier and Mr. Edwards;

Thank you for the opportunity to comment on DEQ's request to exclude 2013 PM<sub>2.5</sub> monitoring values impacted by wildfires at Pinehurst, ID.

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting and preserving Idaho's air quality.

Wildfires and resulting air pollution from smoke are a reality for all western states such as Idaho. We live in an arid region that continues to experience record warm temperatures and drought conditions as a result of climate change. In response to these trends, there is a projected increase in the frequency, duration, and magnitude of forest fires throughout the Western U.S. as a result of warmer, drier periods (see Westerling et al., 2006 for summary and further references).

What this ultimately amounts to is a new norm for western states, one in which wildfires should not be viewed as exceptional events but instead as background conditions. As seen in Figure 1 of DEQ's exemption request report,<sup>1</sup> 2013 was not a particularly bad fire year in terms of acres burned, with a total of 2,204,682 acres burned according to DEQ's report. In contrast, the National Interagency Fire Center reports that the proceeding years

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<sup>1</sup> Exceptional Events Demonstration Requesting Exclusion of PM<sub>2.5</sub> Monitor Values Impacted by

*RE: Idaho Conservation League comments on the Request to Exclude 2013 PM<sub>2.5</sub> Monitoring Values Impacted by Wildfires at Pinehurst, ID*

*Page 1 of 2*

2014, 2015, and year-to-date 2016 all exceed 2013's total burned acreage with total burned acreage of 2,685,721, 7,573,139, and 4,296,790 acres, respectively.<sup>2</sup>

The pattern is clear that wildfires are not exceptional events and instead will continue to occur – year after year – and contribute as background sources of degraded air quality. Unless we adapt to changing conditions in an attempt to manage the variables that are within our control, we will continue to be subjected to poor air quality, especially during the summer months.

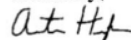
Accurate monitoring data that reflects true conditions is necessary to record ambient conditions, guide management efforts, and ultimately protect the health of residents within a given area. Residents of Idaho are subjected to degraded air quality resulting from these fires regardless of whether or not it could have been controlled or prevented. Residents of impacted areas do not have an option to exclude themselves from breathing polluted air, thus wildfire emissions should not be afforded the option of being excluded from monitoring data either.

Accurate monitoring data is vital to make informed decisions on ways to best protect Idaho's air quality and the health of Idahoans. Omitting data that serves as an accurate representation of real-world conditions provides neither better human-health protections nor more informed management decisions. Instead, it continues us down a path in which we neglect the fact that fires are a natural – and increasing – part of the region we live in.

In summary, we disagree with DEQ's request to exclude this data from the monitoring data. We believe this data provides important information necessary to help guide air quality management efforts and protect human health.

Please do not hesitate to contact me at 208-345-6933 ext. 23 or [ahopkins@idahoconservation.org](mailto:ahopkins@idahoconservation.org) if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,



Austin Hopkins  
Conservation Assistant

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<sup>2</sup> Data accessed 8/25/16 from: <https://www.nifc.gov/fireInfo/nfn.htm>

## **Appendix B DEQ Response to Comments.**

## DEQ RESPONSE TO COMMENTS – 2013 EXCEPTIONAL EVENTS

Idaho Department of Environmental Quality (DEQ) received 2 comments during the public comment period for the 2013 wildfire events and the 2013 high wind event.

### Idaho Conservation League Summarized Comment:

Wildfires should not be excluded as exceptional events from monitoring data to determine an areas monitored design value.

### DEQ Response:

DEQ understands the Idaho Conservation League's concerns with excluding these days from the monitoring data. However, the March 22, 2007 Final Rule, *Treatment of Data Influenced by Exceptional Events*, allows states to exclude natural events, as exceptional events, from the monitoring data in determining an area's design value. As stated in the rule,

*“Exceptional events are events for which the normal planning and regulatory process established by the Clean Air Act (CAA) is not appropriate. ... EPA is finalizing the proposal to: Implement section 319(b)(3)(B) and section 107(d)(3) authority to exclude air quality monitoring data from regulatory determinations related to exceedances or violations of the National Ambient Air Quality Standards (NAAQS) and avoid designating an area as nonattainment, redesignating an area as nonattainment, or reclassifying an existing nonattainment area to a higher classification if a State adequately demonstrates that an exceptional event has caused an exceedance or violation of a NAAQS.”*

By removing these exceptional events from the design value, the state can focus its energies on reducing anthropogenic sources contributing to the increases in design values. To qualify for an exceptional event the event must be “not reasonably controllable or preventable.” To address days with high monitoring values related to exceptional events, DEQ notifies the public and other agencies in an effort to mitigate the impacts to public health.

### (b) (6) Summarized Comments:

(b) (6) had a range of topics in her comments, many of which were outside the scope of this comment period. As stated in the legal notice for this comment period, comments should focus “on whether Idaho has properly demonstrated that the monitor values impacted by the 2013 wildfire season and dust event be excluded as exceptional events.” Many of (b) (6) comments have been addressed in other comment periods and exchanges beyond this specific comment period. This response to comments will address (b) (6) specific comments that are relevant to this comment period and relate to particular days she has questioned and fixing the broken hyperlink.

**Comment 1:**

If DEQ cannot add all flagged dates for submission, it should explain to the reader why it cannot provide information for July 3 and 4, August 23 and September 11, 12 and 13.

**DEQ Response:**

DEQ flags all days that have the potential of being exceptional events. DEQ then follows a thorough process using criteria to identify days with sufficient information to substantiate that the impact is from an exceptional event. DEQ submits days that meet the specific criteria as set forth by the Exceptional Events Rule (EER).

- First, the day must have a regulatory impact. For the Pinehurst PM<sub>2.5</sub> monitor, a day with a 24-hour concentration of 12 µg/m<sup>3</sup> or greater may have an impact on the annual standard for which Pinehurst has recently been declared nonattainment.
- Second, the EER requires that demonstrations to justify data exclusion as exceptional events must provide evidence that the event (a) *affects air quality*; (b) *is not reasonably controllable or preventable*; (c) *is a natural event or is an event caused by human activity that is unlikely to recur at a particular location*; (d) *shows a clear causal relationship between the identified source and measurement under consideration*; (e) *shows the event is associated with measured concentrations in excess of normal historical fluctuations, including background*; and (f) *shows there would have been no exceedance or violation of the standard but for the event*.

DEQ examines each flagged day within the context of these elements. If a flagged day is less than 12 µg/m<sup>3</sup>, then the day is not submitted. If a clear causal relationship between an identified wildfire issuing smoke, and a subsequent impact at the Pinehurst monitor, cannot be established, then the day is not submitted.

Many data are examined to assess whether or not to submit a flagged day as an exceptional event. Examples include:

- visual inspection of MODIS satellite imagery for visible smoke
- plotting HMS fire detects on a map of the region surrounding Pinehurst
- identifying which HMS fire detects correspond to which wildfire by cross-referencing with InciWeb and other fire databases
- plotting the Pinehurst monitor location on a map of the region
- plotting crop residue burn locations on a map of the region
- plotting prescribed burns on a map of the region
- overlaying HYSPLIT back trajectories on all the combined data
- and examining whether the back trajectories bringing air parcels to the Pinehurst monitor throughout the 24-hour period intersect any fire sources or visible smoke

When using the process described above, and a clear causal relationship between the wildfire source and the impacted monitor can be established, then the day is submitted. Additional historical PM<sub>2.5</sub> data, meteorological data, and speciation data are also examined to provide a weight of evidence to the demonstration. If a clear causal relationship cannot be established using the available data, then the day is not submitted. Examples of reasons why a clear causal relationship cannot be established include:

- other emission sources cannot be excluded from impacting the monitor
- there is no visible smoke in the imagery
- the back trajectories do not intersect smoke or fire detects

Each flagged day is subjected to careful analysis. Those that are supported by evidence are included in the demonstration and submitted to EPA for concurrence.

**Comment 2:**

There is a housekeeping omission of “Appendix C” in the Report Summary on page ix; instead the reader sees “0” with a hyperlink to the appendix.

**DEQ Response:**

The hyperlink to Appendix C has been fixed. No other changes have been made to the Exceptional Events documents based on comments received.

## **Appendix C Public Notice and Publication Legal Notice and Certification of Publication**





Protecting Public Health and the Environment.

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Environmental Quality

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DEQ seeks comment on request to EPA to exclude exceptional events affecting air quality in Pinehurst

DEQ seeks comment on request to EPA to exclude exceptional events affecting air quality in Pinehurst

Friday, July 29, 2016

**BOISE** – The Idaho Department of Environmental Quality (DEQ) is seeking public comment on a request to the U.S. Environmental Protection Agency (EPA) to exclude high concentrations of fine particulate matter (PM<sub>2.5</sub>) for a high wind dust event and other impacts during the 2013 wildfire season in Pinehurst from calculations used to assess compliance with federal air quality standards. The exclusion is necessary to ensure the most appropriate data are used when developing the State Implementation Plan for the West Silver Valley Nonattainment Area. A state implementation plan demonstrates how a state will achieve, maintain, and enforce federal air quality standards.

With EPA concurrence, states are allowed to flag air quality data as exceptional and exclude those data in determining compliance with federal air quality standards when exceedances in pollutant levels are due to events that are not reasonably controllable or preventable.

The documents are available for review on DEQ's website (download at right) and upon request at the department's state office in Boise.

Written comments will be accepted through August 29, 2016, at 5 p.m.MDT. Submit comments electronically on DEQ's website or by mail or e-mail to:

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Public Comment Form

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Affiliation

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Thank you

Submit

## AFFIDAVIT OF PUBLICATION

STATE OF IDAHO, }  
County of Shoshone } ss.

Holly Fredericks being first duly sworn  
upon oath deposes and says:

1. I am now and at all times hereinafter mentioned was a citizen of the United States, resident of the State of Idaho, over the age of twenty-one years and not a party of the above entitled action.

2. I am now and at all times hereinafter mentioned was the printer (principal clerk) of the "Shoshone News Press", a newspaper printed and published daily except Sunday and Monday in Kellogg, Shoshone County, Idaho, and having a general circulation in said county.

3. The legal notice

of which the annexed is a printed copy, was published in the regular Sat issue of said newspaper for 2 consecutive days commencing on the 30 day of July, 2016, and such publication was made as often during said period as said daily newspaper was regularly issued.

4. That said newspaper has been continuously and uninterruptedly published in said Shoshone County, during a period of more than seventy-eight consecutive weeks immediately prior to the first publication of said notice Holly Fredericks.  
On this 30 day of July in the year of 2016, before me, a Notary Public, personally appeared Holly Fredericks, known or identified to me to be the person whose name subscribed to the within instrument, and being by me first duly sworn, declared that the statements therein are true, and acknowledged to me that he executed the same.



Katrina George

Notary Public for the State of Idaho  
residing in Coeur d'Alene, Idaho

MY COMMISSION EXPIRES 8/29/17

acted by September 15-16, 2013, High Wind Dust Event<sup>1</sup> demonstrates applicability of the federal Exceptional Events Rule (40 CFR 50 and 51/72 FR 13560)) promulgated on March 22, 2007, due to natural causes. The rule allows states to flag air quality data as exceptional and exclude those data from use in determining compliance with the NAAQS due to events that are not reasonably controllable or preventable - pending EPA concurrence.

The exclusion of these additional days is necessary to ensure the most appropriate design value is used when developing the State Implementation Plan for the West Silver Valley Nonattainment Area.

**BACKGROUND:** DEQ submitted a "Request for EPA Concurrence as Exceptional Events for 2012 Wildfire Impacts on PM2.5 Monitor Values at Salmon and Pinehurst Idaho" on

December 6, 2013, to EPA to exclude high concentrations of PM2.5 recorded during the 2012 wildfire season in Pinehurst and Salmon from calculations used to designate attainment status with the annual National Ambient Air Quality Standard (NAAQS) for PM2.5. Due to limited resources, DEQ only included monitor values that ensured the Pinehurst design value (for 2010-2012 data) was below the standard. Since that original submittal, EPA issued final designations for the annual PM2.5 NAAQS based on 2011-2013 data. As a result, the West Silver Valley was designated a nonattainment area on January 15, 2015 (effective April 15, 2015).

**PUBLIC COMMENT PERIOD:** DEQ has scheduled a period from July 29, 2016, through August 29, 2016, to receive public comments on the proposed request. The document will be available for public review on DEQ's website at [www.deq.idaho.gov/public-comment-opportunities](http://www.deq.idaho.gov/public-comment-opportunities) and upon request at DEQ's State Office in Boise on July 29, 2016.

**SUBMISSION OF WRITTEN COMMENTS-ASSISTANCE ON TECHNICAL QUESTIONS:** Anyone may submit written comments regarding this proposed request on DEQ's website or by mail or e-mail to Anne Drier, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706, or [anne.drier@deq.idaho.gov](mailto:anne.drier@deq.idaho.gov). For technical assistance or questions concerning this request, contact Mike Edwards at [mike.edwards@deq.idaho.gov](mailto:mike.edwards@deq.idaho.gov) or (208) 373-0438.

When sending comments or requesting information, please reference the 2013 reports title listed above. Comments should focus on whether Idaho has properly demonstrated that the monitor values impacted by the 2013 wildfire season and dust event be excluded as exceptional events.

All written comments concerning this proposal must be received on or before 5 p.m., MDT, August 29, 2016.

LEGAL 2282  
JULY 30, 2016

**NOTICE OF 30-DAY  
PUBLIC COMMENT  
PERIOD REQUESTING TO  
EXCLUDE SEVERAL DAYS  
OF AIR QUALITY  
MONITORING  
DATA FROM PM2.5  
CALCULATIONS FOR  
PINEHURST**

**PROPOSED ACTION:** The Idaho Department of Environmental Quality (DEQ) is requesting concurrence from the US Environmental Protection Agency to exclude high concentrations of fine particulate (PM2.5) as Exceptional Events for a high wind dust event on September 15 and 16, and other 2013 wildfire impacts on PM2.5 Monitor Values in Pinehurst Idaho. DEQ has reviewed all the days during the 2013 wildfire season and wind events for Pinehurst and is including all days that meet the requirements for exceptional events.

The reports "Exceptional Events Demonstration Requesting Exclusion of PM2.5 Monitor Values Impacted by Wildfires at Pinehurst, Idaho, in 2013" and "Exceptional Events Demonstration Requesting Exclusion of PM2.5 and PM10 Monitor Val-



## AFFIDAVIT OF PUBLICATION

STATE OF IDAHO,  
County of Kootenai,

} ss.

Holly Fredericks

being first duly sworn

upon oath deposes and says:

1. I am now and at all times hereinafter mentioned was a citizen of the United States, resident of the State of Idaho, over the age of twenty-one years and not a party of the above entitled action.

2. I am now and at all times hereinafter mentioned was the printer (principal clerk) of the "Coeur d'Alene Press," a newspaper printed and published daily except Sunday in Coeur d'Alene, Kootenai County, Idaho, and having a general circulation in said county.

3. The legal notice

of which the annexed is a printed copy, was published in the regular Fri issue of said newspaper for 1 consecutive week commencing on the 29 day of July, 2016, and ending on the 29 day of July, 2016, and such publication was made as often during said period as said daily newspaper was regularly issued.

4. That said newspaper has been continuously and uninterruptedly published in said Kootenai County, during a period of more than seventy-eight consecutive weeks immediately prior to the first publication of said notice. Holly Fredericks On this 29 day of July in the year of 2016, before me, a Notary Public, personally appeared Holly Fredericks, known or identified to me to be the person whose name subscribed to the within instrument, and being by me first duly sworn, declared that the statements therein are true, and acknowledged to me that he executed the same.

Katrina George

Notary Public for the State of Idaho,  
residing at Coeur d'Alene, Idaho.



MY COMMISSION EXPIRES 8/29/17

### NOTICE OF 30-DAY PUBLIC COMMENT PERIOD REQUESTING TO EXCLUDE SEVERAL DAYS OF AIR QUALITY MONITORING DATA FROM PM2.5 CALCULATIONS FOR PINEHURST

**PROPOSED ACTION:** The Idaho Department of Environmental Quality (DEQ) is requesting concurrence from the US Environmental Protection Agency to exclude high concentrations of fine particulate (PM2.5) as Exceptional Events for a high wind dust event on September 15 and 16, and other 2013 Wildfire impacts on PM2.5 Monitor Values in Pinehurst Idaho. DEQ has reviewed all the days during the 2013 wildfire season and wind events for Pinehurst and is including all days that meet the requirements for exceptional events.

The reports "Exceptional Events Demonstration Requesting Exclusion of PM2.5 Monitor Values Impacted by Wildfires at Pinehurst, Idaho, in 2013" and "Exceptional Events Demonstration Requesting Exclusion of PM2.5 and PM10 Monitor Values at Pinehurst, Idaho, Impacted by September 15-16, 2013, High Wind Dust Event" demonstrates applicability of the federal Exceptional Events Rule (40 CFR 50 and 51/72 FR 13560) promulgated on March

22, 2007, due to natural causes. The rule allows states to flag air quality data as exceptional and exclude those data from use in determining compliance with the NAAQS due to events that are not reasonably controllable or preventable, pending EPA concurrence.

The exclusion of these additional days is necessary to ensure the most appropriate design value is used when developing the State Implementation Plan for the West Silver Valley Nonattainment Area.

**BACKGROUND:** DEQ submitted a "Request for EPA Concurrence as Exceptional Events for 2012 Wildfire Impacts on PM2.5 Monitor Values at Salmon and Pinehurst Idaho" on

December 6, 2013, to EPA to exclude high concentrations of PM2.5 recorded during the 2012 wildfire season in Pinehurst and Salmon from calculations used to designate attainment status with the annual National Ambient Air Quality Standard (NAAQS) for PM2.5. Due to limited resources, DEQ only included monitor values that ensured the Pinehurst design value (for 2010-2012 data) was below the standard. Since that original submittal, EPA issued final designations for the annual PM2.5 NAAQS based on 2011-2013 data. As a result, the West Silver Valley was designated a nonattainment area on January 15, 2015 (effective April 15, 2015).

**PUBLIC COMMENT PERIOD:**

DEQ has scheduled a period from July 29, 2016, through August 29, 2016, to receive public comments on the proposed request. The document will be available for public review on DEQ's website at [www.deq.idaho.gov/public-comment-opportunities](http://www.deq.idaho.gov/public-comment-opportunities) and upon request at DEQ's State Office in Boise on July 29, 2016.

**SUBMISSION OF WRITTEN COMMENTS-ASSISTANCE ON TECHNICAL QUESTIONS:**

Anyone may submit written comments regarding this proposed request on DEQ's website or by mail or e-mail to Anne Drier, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706, or [anne.drier@deq.idaho.gov](mailto:anne.drier@deq.idaho.gov). For technical assistance or questions concerning this request, contact Mike Edwards at [mike.edwards@deq.idaho.gov](mailto:mike.edwards@deq.idaho.gov) or (208) 373-0438.

When sending comments or requesting information, please reference the 2013 reports title listed above. Comments should focus on whether Idaho has properly demonstrated that the monitor values impacted by the 2013 wildfire season and dust event be excluded as exceptional events.

All written comments concerning this proposal must be received on or before 5 p.m., MDT, August 29, 2016.

LEGAL 6000  
JULY 29, 2016

